

REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed December 12, 2005. Upon entry of the amendments in this response, claims 1 – 3, 5 – 9, 11, 13 and 15 – 17 remain pending. In particular, Applicants have amended claims 1, 3, 7, 8, 11 and 13. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

Rejections Under 35 U.S.C. §112, Second Paragraph

The Office Action indicates that claims 1 – 3, 5 – 9, 11, 13, and 15 – 19 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In this regard, Applicant has amended the claims to render the aforementioned rejections moot.

Applicant respectfully notes that the amendments to accommodate the alleged 35 U.S.C. 112 (second paragraph) issues may also have accommodated the art rejections under 35 U.S.C. 103, thereby rendering those rejections moot. That is, Applicant's incorporation of the term "O/S protocol-type dependent command" resolves any ambiguity that may have been in the claims, and clearly distinguishes over the teachings of the cited references as is described in detail below.

Rejections Under 35 U.S.C. §103

The Office Action indicates that claims 1 – 3, 5 – 9, 11, 13, and 15 – 19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Ratnaraj* in view of *Fink*. Applicants respectfully traverse the rejections.

In this regard, the Office Action contends that *Fink* teaches the separate steps of:

1) receiving a log-in request to connect the target device to the host device, wherein the log-in request includes a host designator identifying a type of host device; and 2) receiving a command from the host device. The Office Action further indicates that *Fink* teaches, with respect to the received command, determining if the command is an O/S dependent command. Additionally, the Office Action contends that *Fink* teaches accessing the table only if the received command is an O/S dependent command. Applicants respectfully disagree with this interpretation of *Fink*.

In particular, the Office Action contends that *Fink* discloses the aforementioned features at column 7, lines 25 – 50; and column 3, lines 1 – 17. However, these portions of *Fink* disclose the following:

Referring now to FIG. 3, a flow diagram depicts the process for establishing communications between the Unix system 200 and the Windows NT system 250. ***At step 305, an NT register program 302 registers a login name and password.*** Each of the calling Unix systems or users can be provided a login name or password which is then stored in an NT file system 310 in the storage device 110. At step 315, the process according to the present invention is started where the Unix system 200 places a call to the Windows NT system 250 by dialing a telephone number associated with the NT system 250 and the Unix system 200 sends a login to the Windows NT system 250 over the phone line. At step 320, the modem associated with the communication interface 118 on the Windows NT system 250 answers the telephone call from the Unix system 200. ***At step 325 a determination is made as to whether the login sent from the Unix system 200 to the NT system 250 is registered by accessing the NT file system stored in the storage device 110 at step 310 to determine whether the login name and password are registered. If the determination by the Windows NT system 250 in step 325 is no, then the telephone call is dropped by the Windows NT system 250 at step 328. If the determination by the Windows NT system 250 at step 325 is yes, then at step 330 the NT system 250 gets the password from file stored in the storage device 110 and sends "password" on phone line to the Unix system 200 and then waits at step 330.***

(*Fink* at column 7, lines 25 – 50). (Emphasis added).

The foregoing and other objects of the present invention are achieved by a computer architecture for establishing communication between a first computer and a second computer. Obtaining means are provided for obtaining a user login and password. Initiating means are provided for initiating

communications between the first computer and the second computer by sending the user login from the first computer to the second computer. Sending means are provided for sending the password from the second computer to the first computer. Bypassing means are provided for bypassing a message sent by the second computer to the first computer. Establishing means are provided for establishing a connection between an operating system on the first computer and an operating system on the second computer.

The foregoing and other objects of the present invention are achieved by a computer system for establishing communication between a first computer and a second computer includes a processor and a memory coupled to the processor. The memory has stored sequences of instructions which, when executed by the processor, causes the processor to obtain a user login and password. The processor initiates communication between the first computer and the second computer by sending the user login from the first computer to the second computer. The processor sends the password from the second computer to the first computer. The processor bypasses a message sent by the second computer to the first computer and establishes a connection between an operating system on the first computer and an operation system on the second computer.

(*Fink* at column 2, line 66 – column 3, line 27).

As set forth above, it appears that the Office Action is correlating the teaching of *Fink* of a login name and password as corresponding to Applicant's "receiving a login request." This correlation appears reasonable. However, the Office Action also appears to be contending that the login name and password of *Fink* somehow correspond to Applicant's "receiving a command from the host device." Notably, Applicant has recited two distinct and independent steps. Thus, Applicant respectfully asserts that attribution of a single teaching of *Fink* that involves a login to two distinctly-recited steps (only one of which involves a login) is improper. Therefore, for at least this reason, Applicant respectfully asserts that the rejection is improper, should be removed, and that the claims should be placed in condition for allowance.

Additionally, the Office Action does not appear to address the recited feature of the claims involving "only if the received command is an O/S dependent command, accessing a table." This aspect of the claims was addressed in Applicant's last response, in which Applicants respectfully asserted that such an interpretation of *Fink* was improper

because *Fink* is accessing the table in all cases. This is in direct contrast to the limitations recited in Applicants' claims. In this regard, *Fink* checks to see if the login and password are registered for all platforms regardless of the type of platform. Thus, *Fink* can not be said to distinguish between an O/S protocol-type dependent command and a non-O/S protocol-type dependent command in the context of accessing a table. Notably, it appears that the Office Action has avoided addressing this issue entirely, thereby failing to present a prima facie case of obviousness. For at least this additional reason, Applicant respectfully asserts that the rejection is improper, should be removed, and that the claims should be placed in condition for allowance.

In this regard, Applicants have amended claim 1 to recite:

1. A method for configuring a target device to operate as peripheral hardware for a host device, comprising the computer-executed steps of:
 - receiving a log-in request* to connect the target device to the host device, wherein the log-in request includes a host designator identifying a type of host device;
 - receiving a command from the host device;*
 - determining if the command is an operating system (O/S) protocol-type dependent command;*
 - only if the received command is an O/S protocol-type dependent command, accessing a table* of host designators and associated O/S protocol types to determine if there is a match of the log-in request host designator to a host designator in the table; and
 - selecting an O/S protocol associated with the match to the host designator such that the O/S protocol selected is used by the target device to interpret the command received from the host device.*

(Emphasis added).

Applicants respectfully assert that the cited art, either individually or in combination, is legally deficient for the purpose of rendering claim 1 unpatentable. In particular, Applicants respectfully asserts that none of the references or combinations thereof teaches or reasonably suggest at least the features/limitations emphasized above in claim 1. Therefore, Applicants respectfully assert that claim 1 is in condition for allowance.

Since claims 2 – 6 and 14 - 16 are dependent claims that incorporate all the features/limitations of claim 1, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

With respect to claim 7, Applicants have amended that claim to recite:

7. A system for configuring itself for a particular O/S protocol, comprising:
a table of system host system designators and associated O/S protocol types;
a first component for receiving a log-in request to connect the system to a host, wherein the log-in request includes a host designator;
a second component for receiving a command from the host and determining if the command is an O/S protocol-type dependent command;
a third component for accessing the table of host designators and associated O/S protocol types only if the received command is an O/S protocol-type dependent command;
a fourth component for determining if there is a match of the log-in request host designator to a host designator in the table; and
a fifth component for selecting an O/S protocol associated with the match to the host designator such that the O/S protocol selected is used by the system to interpret the command received from the host.

(Emphasis added).

Applicants respectfully assert that the cited art, either individually or in combination, is legally deficient for the purpose of rendering claim 7 unpatentable. In particular, Applicants respectfully asserts that none of the references or combinations thereof teaches or reasonably suggest at least the features/limitations emphasized above in claim 7. Therefore, Applicants respectfully assert that claim 7 is in condition for allowance.

Since claims 8, 9 and 17 - 19 are dependent claims that incorporate all the features/limitations of claim 7, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

With respect to claim 11, Applicants have amended that claim to recite:

11. A program product for configuring a target device, comprising machine-readable program code for causing a machine to perform the following method steps:
receiving a log-in request to connect the target device to a host, wherein the log-in request includes a host designator;
receiving a command from the host device;
determining if the command is an 0/S protocol-type dependent command;
only if the received command is an 0/S protocol-type dependent command, accessing a table of host designators and associated 0/S types to determine if there is a match of the log-in request host designator to a host designator in the table; and
selecting an 0/S protocol associated with the match to the host designator such that the 0/S protocol selected is used by the target device to interpret the command received from the host.

(Emphasis added).

Applicants respectfully assert that the cited art, either individually or in combination, is legally deficient for the purpose of rendering claim 11 unpatentable. In particular, Applicants respectfully asserts that none of the references or combinations thereof teaches or reasonably suggest at least the features/limitations emphasized above in claim 11. Therefore, Applicants respectfully assert that claim 11 is in condition for allowance.

Since claim 13 is a dependent claim that incorporates all the features/limitations of claim 11, Applicants respectfully assert that this claim also is in condition for allowance. Additionally, this claim recites other features/limitations that can serve as an independent basis for patentability.

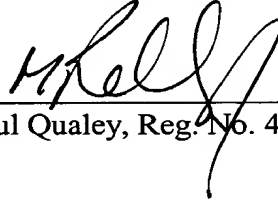
Cited Art Made of Record

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

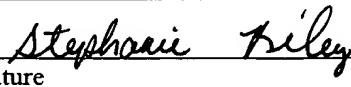
Respectfully submitted,



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